

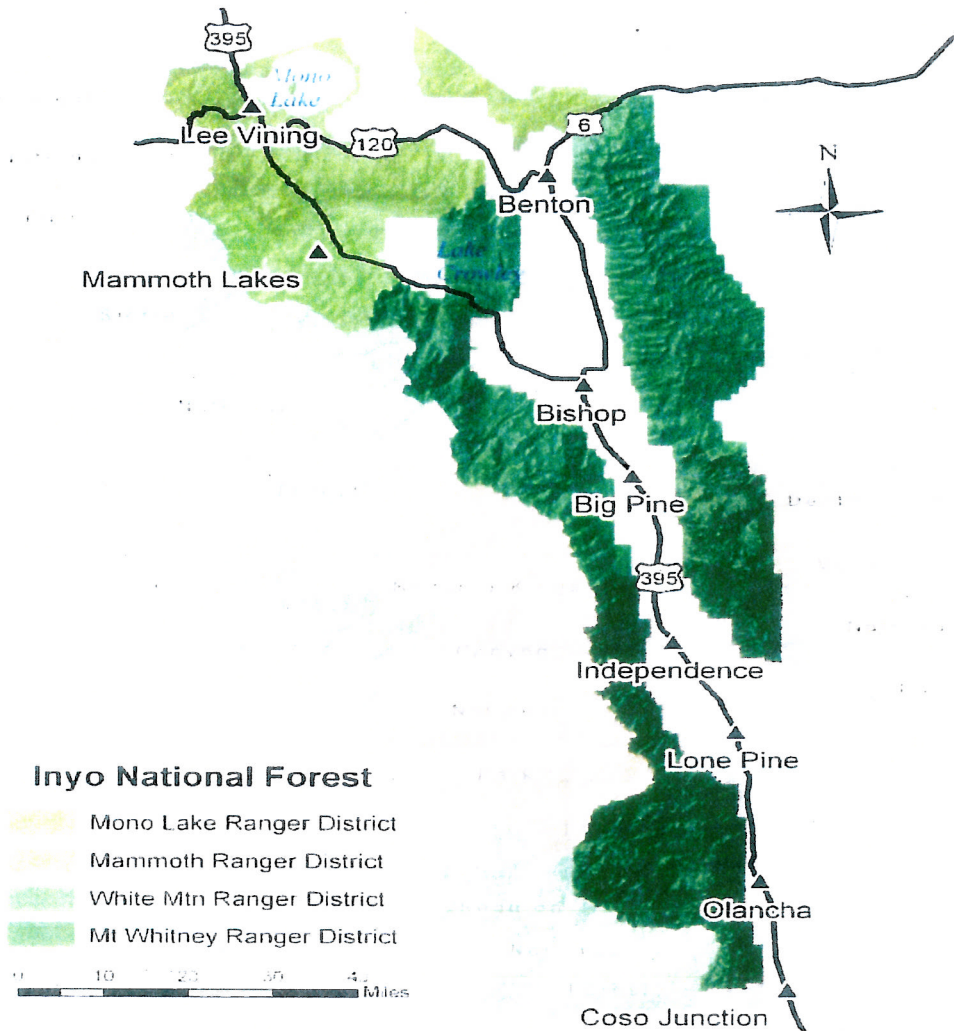
**Region 9 Enforcement Division
INSPECTION REPORT TEMPLATE**

Inspection Date(s):	July 7 – July 9, 2015		Inspection Announced: No
Time:	Entry: Varied		Exit: Varied
Media:	Underground Injection Control		
Regulatory Program(s)	SDWA, UIC, Class 5 Wells		
Company Name:	U.S. Dept. of Agriculture, Inyo National Forest		
Facility or Site Name:	Multiple campgrounds (see below)		
Facility/Site Physical Location:	Multiple Locations (see below)		
(city, state, zip code)	Between Lee Vining and Mammoth Lakes, CA		
Geographic Coordinates:	Mult. GPS Coordinates (see below)		
Mailing address:	Inyo National Forest Headquarters, 351 Pacu Lane, Suite 200		
(city, state, zip code)	Bishop, CA 93514		
County:	Inyo and Mono Counties, CA		
Facility/Site Contact:	N/A	N/A	
	N/A		
Facility/Site Identifier:	N/A		
Media Number:	N/A		
NAICS:	N/A		
SIC:	N/A		
Facility/Site Personnel Participating in Inspection:			
N/A	{affiliation}	{title}	{email/phone no.}
{name}	{affiliation}	{title}	{email/phone no.}
{name}	{affiliation}	{title}	{email/phone no.}
Inspector(s):			
Aaron Setran	Signature:		date:
	ENF-3-3	Env. Scientist	Setran.aaron@epa.gov (415-972-3457)
{support inspector name}	{affiliation/mailcode}	{title}	{email/phone no.}
Additional Persons Participating in Inspection: {Non-Inspector Federal/State/Tribal/Local Personnel}			
{name}	{agency/affiliation}	{title}	{email/phone no.}
{name}	{agency/affiliation}	{title}	{email/phone no.}
Inspection Report Author:			
Aaron Setran	Signature:		
	Enf-3-3	Enf Officer	415-972-3457
Supervisor Review:			
Roberto Rodriguez	Signature:		{date}
	Enf-3-3	Supervisor	9/10/15

SECTION I – INTRODUCTION

Purpose of the Inspection Objective

Purpose of the SDWA UIC Class 5 Well inspections were to ascertain whether or not large capacity cesspools (which were banned by EPA as of April 2005) are being employed by the USDA, National Forest Service, on public and private campgrounds in the northern section of Inyo National Forest, located between the towns of Lee Vining and Mammoth Lakes, CA; inspections took place in the Mono Lake, Mammoth and White Mountains Ranger Districts (see Map below). 32 Campgrounds were inspected on July 7, 8, and 9, 2015.



Opening Conference

Inspections were unannounced. Where possible, I presented my credential to campground hosts in order to identify myself, identify my intent to inspect the campground facility for the occurrence of large capacity cesspools (aka: "pit toilets" and "latrines"), and to establish the location of all bathroom facilities located on individual campgrounds so a proper inspection could be conducted. Some campgrounds were not staffed by campground hosts, or the hosts were absent at the time of inspections. In those instances, inspections were conducted without the presentation of my inspector credential.

Facility/Site Description

- Type of facility/site: recreational campgrounds (developed)
- Facility/site background: located on USDA, National Forest Property
- Description of facility/site diagram or map: see map above
- Facility/site locations: multiple bathroom facilities located at various locations within the boundary of individual campgrounds.
- Underground Injection: Untreated human sewage.
- Number of campers/visitors: seasonal, w/ the capacity to serve 20 or more within a 24 hr period.
- Operation hours: seasonal (April thru October), and 24-hrs per day.

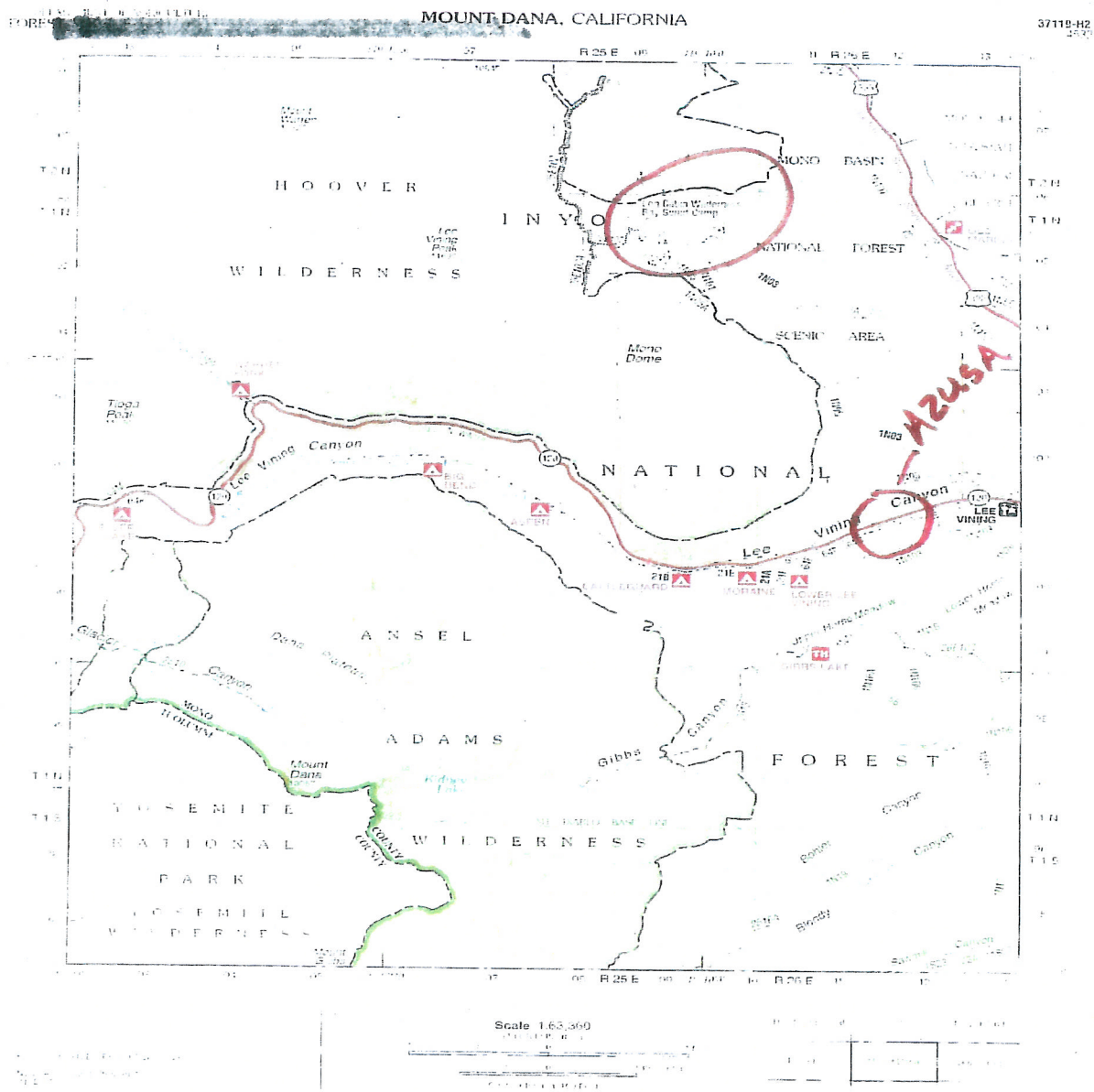
SECTION II – OBSERVATIONS

A. AZUSA SENIOR CAMP

- Azusa Senior Camp (GPS Coord.: 37° 56.142' N; 119° 8.541' W; see Mount Dana Quad Map below), located on Inyo National Forest (Mono Lake District), on Hwy 120 between the town of Lee Vining and Yosemite NP, along and adjacent to Lee Vining Creek. Azusa SC is a private campground, for members only, and not open to public camping. However, according to information obtained from the Campground Host, non-members have access to use the campsites (for a fee) if campsites are not occupied by members.
- Region IX has no records related to Class 5 injection wells at Azusa Senior Camp.

- I inspected the camp on July 7, 2015, at about 2pm. I spoke to the Camp Brd of Directors President, Mr. Jim Daugherty (REDACTED), who was present at the time of my inspection. Mr. Daugherty reported to me that he believed that the camp property was owned by the City of Los Angeles, and that the camp was able to exist via a long-term lease established decades ago w/ the City of LA. Mono County Assessor records show that the campground is located on two separate parcels, one owned by City of Los Angeles (Property No. 021-130-003-000) and the other by Inyo National Forest (Property No. 021-130-005-000); see Mono County Parcel Map, below). I observed and photo-documented 6 "pit toilets" which appear to meet the criteria for large capacity cesspools. It appears that two of the pit toilets (Nos. 1 and 2) are located on property owned by USDA, while the other four (Nos. 3, 4, 5 and 6) are on property owned by the City of LA.
- I informed Mr. Daugherty that the "pit toilets" at Camp Azusa appear to meet the criteria for large capacity cesspools (LCCs), and that the use of LCCs for sewage disposal is a banned method under the SDWA.
- Mr. Daugherty told me that there is a total of 26 camp sites, the campground is generally open between May 15th and October 15th of each year. Each camp site is designed to accommodate a single recreational vehicle, which can accommodate up to 6 persons. Potable water is provided to campers from Lee Vining Creek via a pump/hose system. Water is pumped from Lee Vining Creek into a black storage tank located on the campground (see Photograph 4.2, below), and a distribution system (consisting of subsurface pipes and hoses) connects the storage tank to each camp site. It is not known if the water in the storage tank is treated in any manner prior to being distributed to camp sites.

Inyo National Forest; multiple campgrounds
Inspection Date(s) July 7, 8 and 9th, 2015



(<https://gis.mono.ca.gov>) **PARCEL VIEWER 4.0** [Map \(/apps/pv/map\)](#)

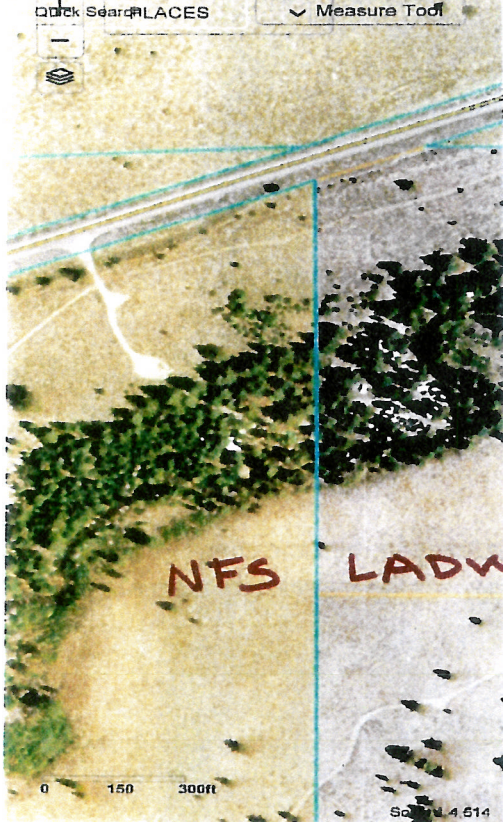
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[Quick Search PLACES](#) [Measure Tool](#)

9806 HWY 120
021-090-012-000

[View / Print Value Notice \(http://apps.mptsweb.com/\)](#)

Address	9806 HWY 120
Community	Lee Vining
Complex	Camp Azusa
Land Use Code	RM
	(https://gis.mono.ca.gov/parcelview)
Zoning	N/A
Division Type	Lot
Parcel Type	Land Parcel
Stated Area	560 a
Calculated Acres	1,000.03



1. Camp Entrance located 150 yds south of HWY 120, adjacent to Lee Vining Creek, approximately 5 miles west from the town of Lee Vining.



Photograph 1

2. Camping Area near the main entrance (west-end) of the camp.



Photograph 2

3. Pit toilets (Nos. 1 and 2) located near the west-end of the camp.



Photograph 3

4. Pit toilets (Nos. 3 and 4) located near the center area of the camp. A black water storage tank seen in Photograph 4.2 (below), on a small elevated area above the two pit toilets.



Photograph 4



Photograph 4.2

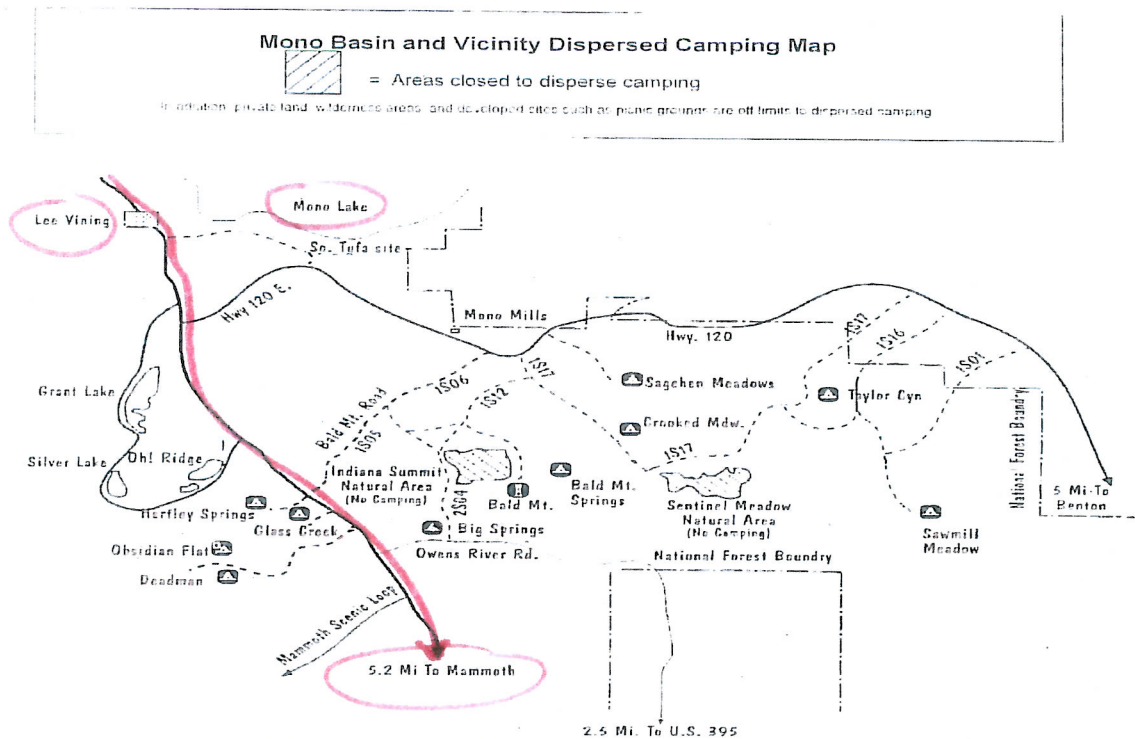
5. Pit toilets (Nos. 5 and 6) located near the rear of the east-end of the camp.



Photograph 5

B. BIG SPRINGS CAMPGROUND

- Big Springs Campground (GPS Coord.: 37° 44. 941' N; 118° 56.350' W; see "Mono Basin and Vicinity Dispersed Camping Map", below), located off Owen's River Road on Inyo National Forest (Mammoth District), is a public campground operated by a federally contracted concessioner. Deadman Creek runs adjacent to the campground.
- Region IX has no records related to Class 5 injection wells at Big Springs Campground.
- I inspected the camp on July 8, 2015, at about 9am. There are 26 campsites at this campground. Each camp site can accommodate up to six persons.
- I observed and photo-documented 4 "pit toilets" which appear to meet the criteria for large capacity cesspools. I also observed and photo-documented evidence of eutrophication (algal growth; see Photograph No. 11) and a water pipe (see Photographs 12 and 13, below) located in Deadman Creek, which runs adjacent to the campground. The water pipe (made of PVC) appeared to "tap into" a fresh water spring emanating from the southern embankment of Deadman Creek, at the base of the campground. During my inspection, I observed two persons drinking and collecting water from the pipe; see Photograph No. 13. No campground host was available at this site.



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1. Entrance to Big Springs Campground



Photograph No. 6

2. Pit toilet (No. 1) located near the entrance of Big Springs Campground



Photograph No. 7

3. Pit Toilet (No. 2) located near the center of Big Springs Campground



Photograph No. 8

4. Pit Toilet (No. 3) located near the center of Big Springs Campground



Photograph No. 9

5. Pit Toilet (No. 4) located near the back-end of Big Springs Campground



Photograph No. 10

6. Signs of eutrophication in Deadman Creek, located adjacent to Big Springs Campground



Photograph No. 11

7. Drinking Water pipe located in Deadman Creek, at the base of Big Springs Campground



Photograph No. 12

8. Camper filling-up a water bottle at the pipe location.



Photograph No. 13

C. Glass Creek Campground

- Glass Creek Campground (GPS Coord.: 37° 45. 629' N; 118° 59.118' W; see "Mono Basin and Vicinity Dispersed Camping Map", above), located off Glass Creek Road on Inyo National Forest (Mammoth District), is a public campground operated by a federally contracted concessioner. Glass Creek runs through the campground.
- Region IX has no records related to Class 5 injection wells at Glass Creek Campground.
- I inspected the camp on July 8, 2015, at about 10am. I observed and photo-documented 5 "pit toilets" which appear to meet the criteria for large capacity cesspools.
- I interviewed the campground host, who went by the name of Dave and told me that he is a retired City of Los Angeles firefighter. Dave told me that the campground has 60 camp sites, and that each camp site could accommodate up to 6 persons (campers). Dave also told me that, as a matter of routine maintenance, he pours a combination of bleach and Pinesol [™] into the pit toilets as a method of curtailing odor.

1. Entrance to Glass Creek Campground



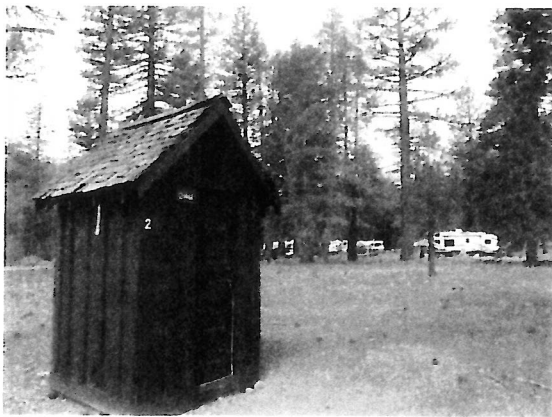
Photograph No. 14

2. Pit Toilet No. 1 located near the entrance of Glass Creek Campground



Photograph No. 15

3. Pit Toilets Nos. 2, 3, 4 and 5, as shown in Photographs 16, 17 and 18, below, respectively, located at Glass Creek Campground



Photograph 16



Photograph 17



Photograph 18

D. HARTLEY SPRINGS CAMPGROUND

- Hartley Springs Campground (GPS Coord.: 37° 46. 177 'N; 119° 2.155' W; see "Mono Basin and Vicinity Dispersed Camping Map", above), located on Inyo National Forest (Mammoth District) off of Hartley Springs Road, is a public campground operated by a federally contracted concessioner. Hartley Springs is located near the campground.
- Region IX has no records related to Class 5 injection wells at Hartley Springs Campground.
- I inspected the camp on July 8, 2015, at about 11am. I observed and photo-documented 2 "pit toilets" which appear to meet the criteria for large capacity cesspools.
- The earthen area around Pit Toilet No. 1 had eroded so that the pit was exposed to sunlight (see Photograph 21).
- I interviewed the campground host, who did not provide his name. He told me that the campground has 20 camp sites, that each site can accommodate up to 6 persons (campers), and that he is not at the campground all the time.

1. Entrance to Hartley Springs Campground



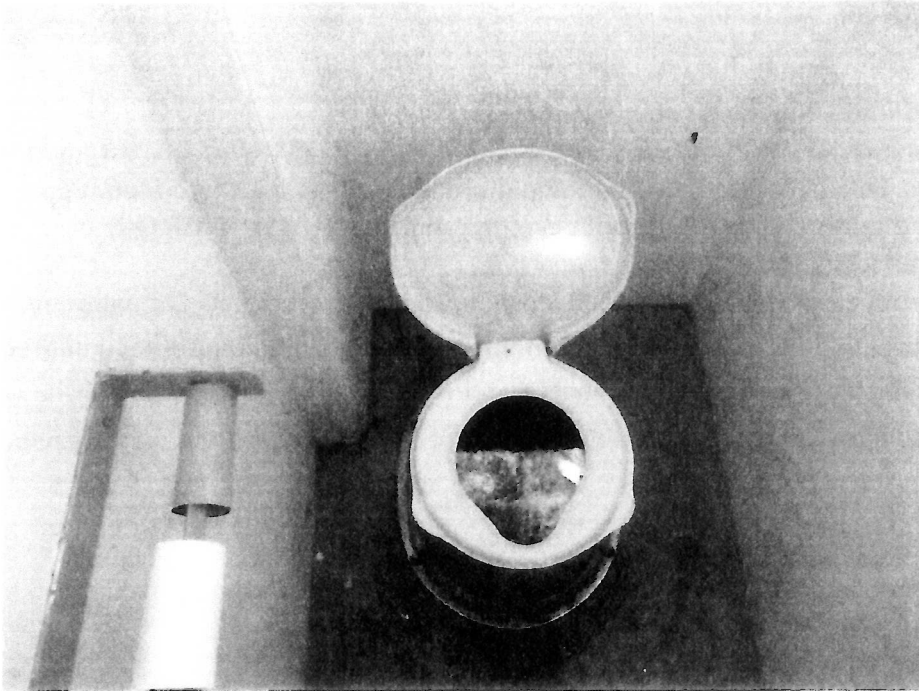
Photograph No. 19

2. Pit Toilet (No. 1) located near the rear of Hartley Springs Campground



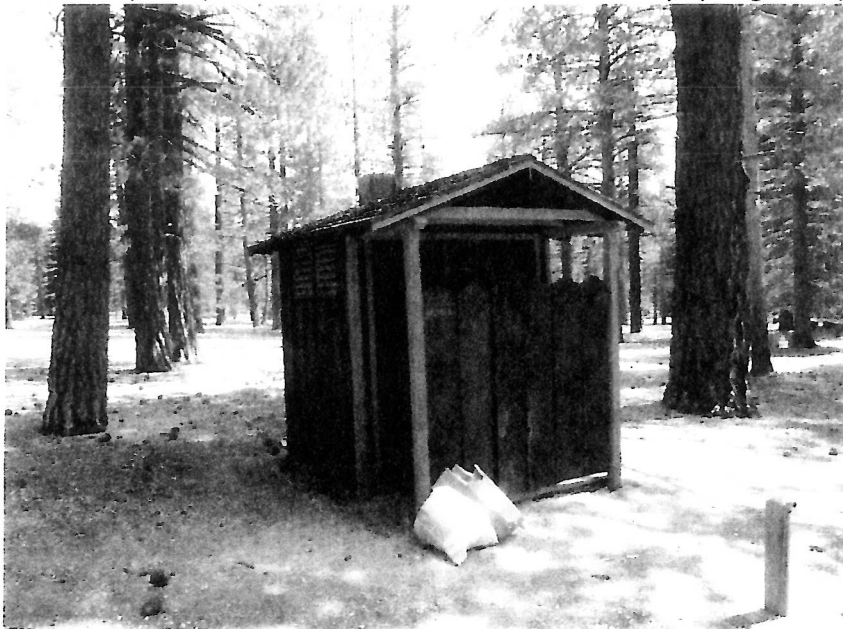
Photograph No. 20

3. Sunlight reaching the base (bottom) of Pit Toilet No. 1 (Hartley Springs CG) from the exterior of the structure



Photograph No. 21

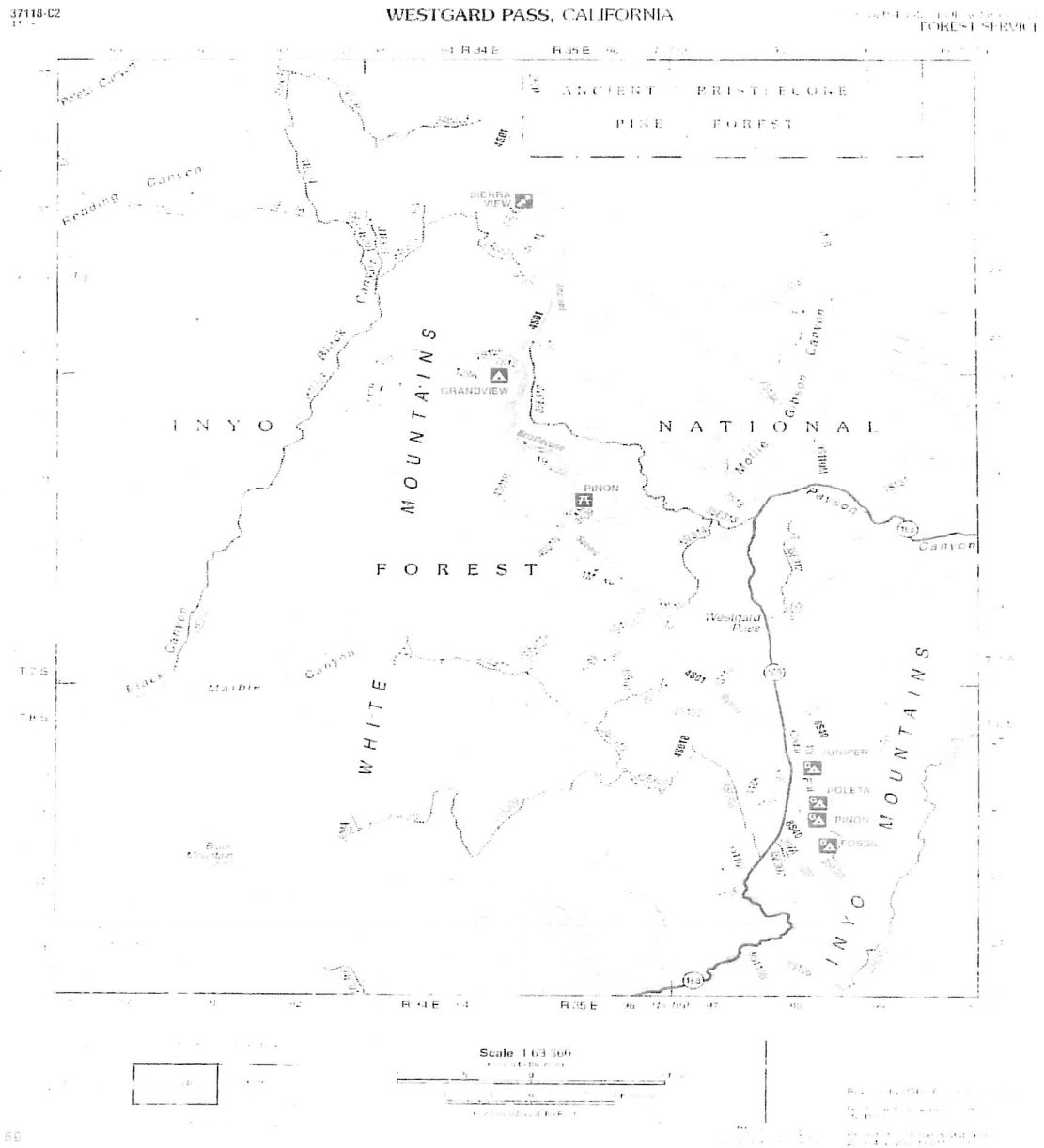
4. Pit Toilet (No. 2) located near the entrance of Hartley Springs Campground



Photograph No. 22

E. GRAND VIEW CAMPGROUND (White Mountains)

- Grand View Campground (GPS Coord.: 37° 19. 597' N; 118° 11.234' W; see Westguard Pass Quad Map, below), located on Inyo National Forest located off White Mountain Road (White Mountain District), is a public campground operated by a federally contracted concessioner.
- Region IX has no records related to Class 5 injection wells at Grand View Campground.
- I inspected the camp on July 8, 2015, at about 5pm. I observed and photo-documented 2 "pit toilets" which appear to meet the criteria for large capacity cesspools.
- No campground host was located on site. There are 30 camp sites at this campground.

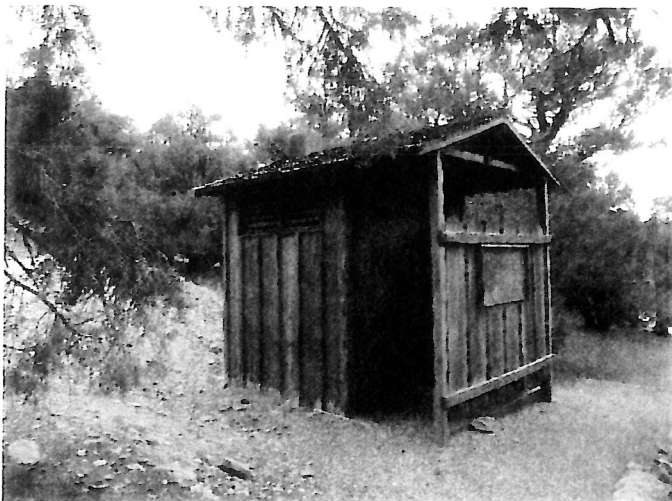


1. Entrance to Grand View Campground



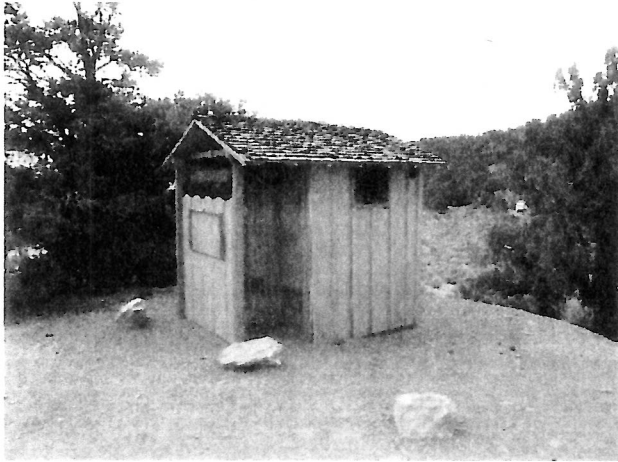
Photograph No. 23

Pit Toilet (No. 1) located near the entrance of Grand View Campground



Photograph No. 24

Pit Toilet (No. 2) located near the entrance of Grand View Campground



Photograph No. 25

F. Bald Mountain Lookout Facility and Cabin

- (GPS Coord.: 37° 47. 202' N; 118° 54.656' W; see Mono Basin and Vicinity Dispersed Camping Map, above), located on Inyo National Forest in the Mammoth District.
- Region IX has no records related to Class 5 injection wells at this facility.
- I inspected this facility on July 9, 2015, at about 4:30pm. I observed one (1) "pit toilet" which may or may/not meet the criteria for large capacity cesspools; capacity of 20 persons or more within a 24 hr period is at issue. Photographs were not taken during this inspection.
- No campground host was located on site. There are no camp sites at this facility, but an overnight cabin and observation/research building are situated at this location.

G. Sage Hen Meadow Campground

- Sage Hen Meadow (GPS Coord.: 37° 48. 109' N; 118° 52.504' W; see Mono Basin and Vicinity Dispersed Camping Map, above), located on Inyo National Forest in the Mammoth District, is a public campground.
- Region IX has no records related to Class 5 injection wells at this facility.
- I inspected the camp on July 9, 2015, at about 5pm. I observed one (1) "pit toilet" which may or may/not meet the criteria for large capacity cesspools; capacity of 20 persons or more within a 24 hr period is at issue. Photographs were not taken during this inspection.

- No campground host was located on site. There are between 6-10 camp sites at this facility, as the individual camp sites are not well defined being a dispersed camping area.

H. Crooked Meadow Campground

- Crooked Meadow Campground (GPS Coord.: 37° 49. 109' N; 118°50.504' W; see Mono Basin and Vicinity Dispersed Camping Map, above), located on Inyo National Forest located in the Mammoth District, is a public campground.
- Region IX has no records related to Class 5 injection wells at this facility.
- I inspected the camp on July 9, 2015, at about 5:45pm. I observed one (1) "pit toilet" which may or may/not meet the criteria for large capacity cesspools; capacity of 20 persons or more within a 24 hr period is at issue. Photographs were not taken during this inspection.
- No campground host was located on site. There are between 6-10 camp sites at this facility, as the individual camp sites are not well defined being a dispersed camping area.

I. Adobe Meadow Campground

- Crooked Meadow Campground (GPS Coord.: 37° 47. 108' N; 118°51.503' W; see Mono Basin and Vicinity Dispersed Camping Map, above), located on Inyo National Forest located in the Mammoth District, is a public campground.
- Region IX has no records related to Class 5 injection wells at this facility.
- I inspected the camp on July 9, 2015, at about 6:15pm. I observed one (1) "pit toilet" which may or may/not meet the criteria for large capacity cesspools; capacity of 20 persons or more within a 24 hr period is at issue. Photographs were not taken during this inspection.
- No campground host was located on site. There are between 6-10 camp sites at this facility, as the individual camp sites are not well defined being a dispersed camping area.

J. Bald Mountain Springs Campground

- Crooked Meadow Campground (GPS Coord.: 37° 48. 122' N; 118°51.272' W; see Mono Basin and Vicinity Dispersed Camping Map, above), located on Inyo National Forest located in the Mammoth District, is a public campground.
- Region IX has no records related to Class 5 injection wells at this facility.
- I inspected the camp on July 9, 2015, at about 7pm. I observed one (1) "pit toilet" which may or may/not meet the criteria for large capacity cesspools; capacity of 20 persons or more within a 24 hr period is at issue. Photographs were not taken during this inspection.

- No campground host was located on site. There are between 12-14 camp sites at this facility, as the individual camp sites are not well defined being a dispersed camping area.

SECTION III – AREAS OF CONCERN

The presentation of areas of concern does not constitute a formal compliance determination or violation.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

General Concerns

The campgrounds listed in this report are “dry campgrounds” in that potable water is not provided by the property owner or campground concessionaire to campers via a standard drinking water spigot. Campers, then, either have to import drinking water from an outside source to the campground or obtain it from a nearby surface water. It is my opinion, based on my experience as an UIC inspector since 2004, that the documented “pit toilets” pose a risk to not only ground water, but to nearby surface waters, and therefore, could pose a threat to the health of campers using the surface waters for drinking water purposes. Therefore, the pit toilets should be properly abandoned.

Closing Conference

N/A

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

N/A

SECTION V – DOCUMENTS REQUESTED AFTER THE INSPECTION

N/A

SECTION VI – LIST OF APPENDICES

N/A